

EXHIBIT 000

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

O. John Benisek, et al.,

Plaintiffs,

vs.

Linda H. Lamone, et al.,

Defendants.

Case No. 13-cv-3233

Three-Judge Court

DECLARATION OF DR. PETER A. MORRISON

1. My name is Dr. Peter A. Morrison. I previously prepared expert reports in this matter dated April 7, 2017 (my “Initial Report”) and May 22, 2017 (my “Reply Report”). The details of my qualifications, assignment, opinions, and analysis are included in those reports and are not repeated here.
2. I have been asked by counsel for Plaintiffs to prepare this declaration to respond to certain criticisms that Defendants made during my deposition and in Defendants’ opposition to Plaintiffs’ Motion for Preliminary Injunction, or, in the alternative, for Summary Judgment.
3. During my deposition, Defense counsel pointed out that the “Unincorporated – Other” row in Table 3 of my initial report was inadvertently left blank.
4. Below is a corrected version of Table 3 to my initial report.

Established Communities of Interest Split by Redistricting (Revised)						
Type of place	No. of communities within 111th CD 6			No. of communities within 113th CD 6		
	Whole	Portion	% split	Whole	Portion	% split
	<i>Incorporated</i>					
Cities	3	0	0%	1	2	67%
Towns/Villages	14	0	0%	3	1	25%
	<i>Unincorporated</i>					
CDPs	114	4	3%	105	10	9%
	<i>All Established Communities</i>					
Total, all places	131	4	3%	109	13	11%

Source: Author's tabulation of all Census Places wholly or partly within 111th or 113th CD6.

5. As shown in the corrected table, the post-2010 reconfiguration of CD6 entailed a massive interchange of territory. Accompanying that interchange was the dismemberment of many existing communities of interest; specifically, the majority of incorporated cities, one of the four incorporated towns, and 9% of the 115 small unincorporated CDPs within the 113th CD6.
6. As noted in paragraph 138 of my Initial Report, an unincorporated CDP is an officially recognized community that bears a locally recognized name. CDPs are less populous and geographically smaller than incorporated cities and towns. There rarely is a justification for splitting such tiny communities in the course of drawing district boundaries. Prior to redistricting, only 3% of the 118 CDPs within the 111th CD6 were split.

7. The bottom row of corrected Table 3 summarizes the overall collateral damage inflicted on recognized communities of interest in the wake of redistricting. Only 3% of 135 such communities in the 111th CD6 were split; fully 11% of 122 such communities ended up being split in the 113th CD6. All such communities—including even small unincorporated CDPs—were disproportionately damaged by the newly established boundaries. In my opinion, this disparity is an indelible statistical footprint of intent.
8. The data in corrected Table 3 discredit any suggestion that a purported shared interest among a small fraction of resident commuters could justify splitting so many more established census places within the 113th CD6 than were split within the 111th CD6. Even granting the existence of that purported shared interest, its significance pales relative to the collective shared interests of the 13 established census places whose boundaries ended up being split in the 113th CD6.
9. The total population of CD6 could easily have been rebalanced without splitting so many existing census places. The post-redistricting increase in non-intact census places (from 3% to 11% of all places) is a “smoking gun” that exposes motives beyond simply rebalancing the total population. The predominant emphasis on “cracking” the Sixth District blatantly subordinated preserving existing communities of interest to removing Republican registered voters and scattering them across other districts.

10. Accordingly, the corrected version of Table 3 reinforces and confirms the opinions discussed in my Initial Report and Reply Report.

Date: July 9, 2017

A handwritten signature in black ink, appearing to read "Peter A. Morrison". The signature is written in a cursive style with a large initial "P" and "M".

Dr. Peter A. Morrison